

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

THE INTERCEPT MEDIA, INC.,

Plaintiffs,

v.

OPENAI, INC., OPENAI GP, LLC, OPENAI,  
LLC, OPENAI OPKO LLC, OPENAI  
GLOBAL LLC, OAI CORPORATION, LLC,  
OPENAI HOLDINGS, LLC, and  
MICROSOFT CORPORATION,

Defendants.

Civil Action No. 1:24-cv-01515-JSR

Hon. Jed S. Rakoff

**NOTICE OF MOTION TO ADMIT  
COUNSEL *PRO HAC VICE***

Pursuant to Rule 1.3(c) of the Local Rules of the United States Courts for the Southern and Eastern Districts of New York, Nicholas S. Goldberg, hereby moves this Court for an Order for admission to practice *Pro Hac Vice* to appear as counsel for Defendants OpenAI, Inc., OpenAI GP, LLC, OpenAI, LLC, OpenAI OpCo, LLC, OpenAI Global, LLC, OAI Corporation, LLC, and OpenAI Holdings, LLC in the above-captioned action.

I am a member in good standing of the bar of the State of California and there are no pending disciplinary proceedings against me in any state or federal court. I have never been convicted of a felony. I have never been censured, suspended, disbarred or denied admission or readmission by any court. I have attached a declaration pursuant to Local Rule 1.3.

Respectfully submitted,

KEKER, VAN NEST & PETERS LLP

Dated: April 24, 2024

By: /s/ Nicholas S. Goldberg  
NICHOLAS S. GOLDBERG  
633 Battery Street  
San Francisco, CA 94111-1809  
Telephone: 415 391 5400  
Facsimile: 415 397 7188  
ngoldberg@keker.com

Attorneys for Defendants OPENAI, INC.,  
OPENAI GP, LLC, OPENAI, LLC, OPENAI  
OPCO LLC, OPENAI GLOBAL LLC, OAI  
CORPORATION, LLC, OPENAI  
HOLDINGS, LLC